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16 UNIVERSITY OF PHOENIX

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA, ex rel.
MARY HENDOW and JULIE
20 ALBERTSON,

21 Plaintiff,

22 v.

23 UNIVERSITY OF PHOENIX,

24 Defendant.

25 CASE NO. CV-03-0457 GEB DAD

26 **STIPULATION AND ORDER
REGARDING THE HEARING SCHEDULE
ON DEFENDANT UNIVERSITY OF
PHOENIX'S UNOPPOSED MOTION FOR
ENTRY OF A PROTECTIVE ORDER
REGARDING PRIVILEGED,
CONFIDENTIAL, AND HIGHLY
CONFIDENTIAL INFORMATION**

27 Judge: Magistrate Judge Dale A. Drozd
Place: Courtroom 27

28 Defendant University of Phoenix ("UOP") and Relators Mary Hendow and Julie
Albertson ("Relators"), hereby submit this Stipulation and [Proposed] Order Regarding the

1 Hearing Schedule on Defendant University of Phoenix's Unopposed Motion for Entry of a
2 Protective Order Regarding Privileged, Confidential, and Highly Confidential Information.

3 **RECITALS**

4 WHEREAS, UOP files concurrently herewith an Unopposed Motion for Entry of a
5 Protective Order Regarding Privileged, Confidential, and Highly Confidential Information
6 ("Motion").

7 WHEREAS, Relators do not oppose the Motion.

8 WHEREAS, Relators have reviewed the [Proposed] Protective Order Regarding
9 Privileged, Confidential, and Highly Confidential Information that UOP files concurrently with
10 its Motion, and Relators have no objection thereto.

11 WHEREAS, the earliest available hearing date pursuant to the Court's local rules is
November 9, 2007.

12 WHEREAS, this hearing date is unnecessarily distant, given that Relators do not oppose
the Motion and will not be filing an opposition.

13 WHEREAS, the parties would like the Motion resolved as soon as possible so that
discovery pursuant to the [Proposed] Protective Order may begin.

14 **THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:**

15 1. Relators do not oppose the Motion, and will not be filing an opposition thereto.
16 2. Relators have no objection to the [Proposed] Protective Order filed by UOP
17 concurrent with its Motion.

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1 3. The hearing date on the Motion shall be taken off calendar and the Court shall
2 decide the Motion at its earliest convenience, in light of Relators' non-opposition to the Motion
3 and the desire by the parties to begin discovery.

4 DATED: October 5, 2007

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
ROBERT J. NELSON

6 By: /s/ Robert J. Nelson (as authorized on
7 October 3, 2007)
Robert J. Nelson

8 Attorney for Relators,
9 MARY HENDOW & JULIE ALBERTSON

10 11 DATED: October 5, 2007

GIBSON, DUNN & CRUTCHER LLP
JAMES L. ZELENAY, JR.

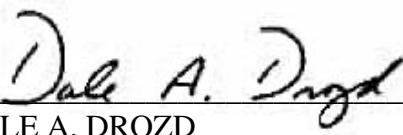
12 13
14 By: /s/ James L. Zelenay, Jr.
James L. Zelenay, Jr.

15 Attorney for Defendant,
16 UNIVERSITY OF PHOENIX

17 **ORDER**

18 Pursuant to the above Stipulation, **IT IS ORDERED** that the hearing on Defendant
19 University of Phoenix's Unopposed Motion for Entry of a Protective Order Regarding
20 Privileged, Confidential, and Highly Confidential Information shall be taken off calendar and
21 the Court will decide the Motion at its earliest available convenience, in light of Relators' non-
22 opposition to the Motion.

23 DATED: November 7, 2007.

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DALE A. DROZD
26 UNITED STATES MAGISTRATE JUDGE

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